

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed May 16, 2007. Claims 37-61 were pending in the Application. In the Office Action, Claims 37-61 were rejected. Claims 37-61 remain pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

SECTION 103 REJECTIONS

Claims 37-61 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,466,203 issued to Van Ee (hereinafter "*Van Ee*") in view of U.S. Patent No. 6,044,445 issued to Tsuda et al. (hereinafter "*Tsuda*"). Applicants respectfully traverse this rejection.

Of the rejected claims, Claims 37, 45, 52, 55 and 58 are independent. Applicants respectfully submit that neither *Van Ee* nor *Tsuda*, alone or in combination, discloses, teaches or suggests the limitations of independent Claims 37, 45, 52, 55 and 58. For example, *Van Ee* appears to disclose a hand-held apparatus 100 having a display 102 for displaying graphical information, a frame buffer 112 coupled to the display 102 for storing information content to be shown on the display 102, and a modem 114 for connecting to the Internet (*Van Ee*, column 3, lines 44-66, figure 1). *Van Ee* recites:

Such handheld devices provided with the auto-zoom feature let the user retrieve graphical information, e.g., a web page or streamed video that is stored, e.g., as a bitmap, in the display's framebuffer or another cache.

(*Van Ee*, column 2, lines 31-35). *Van Ee* does not appear to disclose or even suggest that the data received by the handheld device from the network is "bitmap image data" as recited by Claims 37. To the contrary, the web page content and streamed video content that is received by the *Van Ee* device must presumably be decoded/processed after receipt by the handheld device in order to generate bitmap information storable in a framebuffer of the handheld device. Although *Van Ee* appears to disclose that data is stored as a bitmap, *Van Ee* does not disclose or even suggest that the data that is sent to and received by the *Van Ee* device is in the form of "bitmap image data." *Tsuda* appears to be relied on to purportedly disclose reading data out of

a framebuffer at an appropriate refresh rate for display on a display device (Office action, page 3 (*Tsuda*, column 1, lines 54-65)). Thus, Applicants respectfully submit that neither *Van Ee* nor *Tsuda*, alone or in combination, discloses, teaches or suggests "a display network interface operable to receive bitmap image data of the image from the network" as recited by Claim 37 (emphasis added).

Independent Claim 45, as amended, recites "receiving, via a network interface of a display device communicatively coupled to a network, bitmap image data," and independent Claim 52, as amended, recites "means for receiving, via a display device communicatively coupled to a network, bitmap image data of the image." At least for the reasons discussed above in connection with independent Claim 37, Applicants respectfully submit that Claims 45 and 52 are also patentable over the cited references. Support for the amendments to Claims 37, 45 and 52 may be found at least at page 5, line 10 to page 6, line 29, of Applicants' specification as originally filed.

Claims 38-44, 46-51 and 53-54 depend respectively from independent Claims 37, 45 and 52. At least for the reasons discussed above, independent Claims 37, 45 and 52 are in condition for allowance. Further, at least for Claims 40-42, 46-49 and 53-54, Robotham does not appear to remedy at least the deficiencies of *Van Ee* and *Tsuda* discussed above. Therefore, for at least this reasons, Claims 38-44, 46-51 and 53-54 are also patentable. Accordingly, Applicants respectfully request that the rejection of Claims 37-54 be withdrawn.

Independent Claim 55 recites "a display device communicatively couplable to a network" having "a single-chip display controller" where the "single-chip display controller" comprises "a network interface operable to receive the graphics image data of the image from the network and provide the graphics image data to the frame buffer" and "a display refresh unit operable to read the graphics image data from the frame buffer and display and refresh the image at a refresh rate." In the Office Action, the Examiner appears to acknowledge that neither *Van Ee* nor *Tsuda* discloses the above-referenced limitations of Claim 55 (Office Action, page 4). However, the Examiner asserts that it would be obvious to apparently provide these limitations in the *Van Ee* device (Office Action, page 4). Applicants respectfully disagree. In the Office Action, as a basis for the Examiner's obvious assertion, the Examiner states that "the size of the circuit board can be reduced and the circuit paths can also be shortened, thereby reducing the

cost while enhancing performance" (Office Action, page 4). Applicants respectfully submit that the Examiner's statements are nothing more than unsupported speculations and, therefore, amount to no more than hindsight reasoning, which is improper. For example, the Examiner offers no support or basis, in fact or otherwise, that the size of a circuit board would be decreased by incorporating the limitations recited by Claim 55 in a single-chip display controller. To the contrary, such a single-chip display controller may require greater space on a printed circuit board and require a larger circuit board. Moreover, the single-chip controller of Claim 55 may cost more than alternatives. Accordingly, Applicants respectfully submit that the rejection of Claim 55, and Claims 56 and 57 that depend therefrom, are improper and should be withdrawn.


Independent Claim 58 recites "a display device communicatively couplable to a network and adapted to display the image" where the display device comprises "a display network interface operable to receive graphics image data of the image over the network from a frame buffer of a remote source device" (emphasis added). Applicants respectfully submit that no *prima facie* rejection of Claim 58 has been established. For example, in the Office Action, the Examiner merely refers to the basis for rejecting Claim 37 as a basis for rejecting Claim 58 (Office Action, page 4). However, Claim 37 does not recite "a display network interface operable to receive graphics image data of the image over the network from a frame buffer of a remote source device" as recited by Claim 58 (emphasis added). Accordingly, for at least this reason, the rejection is improper and should be withdrawn. Notwithstanding the above, Applicants respectfully submit that neither *Van Ee* nor *Tsuda* discloses, teaches or suggests the limitations recited by Claim 58. For example, *Van Ee* appears to disclose a hand-held apparatus 100 having a display 102 for displaying graphical information, a frame buffer 112 coupled to the display 102 for storing information content to be shown on the display 102, and a modem 114 for connecting to the Internet (*Van Ee*, column 3, lines 44-66, figure 1). *Van Ee* appears to disclose that graphical information (e.g., a web page or streamed video) is stored in the display's framebuffer or other cache (*Van Ee*, column 2, lines 31-35). However, *Van Ee* does not disclose or even suggest that graphics data is received by the *Van Ee* device from "a frame buffer of a remote source device" as recited by Claim 58 (emphasis added). Further, the Examiner does not rely on *Tsuda* to remedy, nor does *Tsuda* appear to remedy, at least this deficiency of *Van Ee*. Therefore, for at least these reasons, Applicants respectfully submit that Claim 58, and Claims 59-61 that depend therefrom, are patentable over the cited references.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicants have overlooked the need for any fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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